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Attorneys for Debtor

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN JOSE DIVISION**

In re

CASE NO.: 21-50915-SLJ

PIERCE CONTRACTORS, INC.

**RENEWED EX-PARTE APPLICATION  
TO SET PLAN REVIEW CONFERENCE**

Debtor

CHAPTER 11  
(Subchapter V)

Date: None set  
Time: None Set  
Ctrm.: Telephonic or Video Only\*\*\*

Comes now Debtor Pierce Contractors, Inc. and respectfully requests that a plan review conference be set in the herein case.

1. Debtor filed the herein case on July 9, 2021.
2. A motion to value the collateral of the 1<sup>st</sup> lienholder was filed on July 9, 2021.
3. A motion to value the 2<sup>nd</sup> and 3<sup>rd</sup> trust deed was file on July 9, 2021
4. A motion to Incur Debt was filed on July 13, 2021.
5. A plan was filed on July 13, 2021.

1           6.       Though the Court denied Debtor's motion to impose stay, a new stay has been  
2 imposed by Debtor's individual filing.

3           7.       Any prospects for retaining Debtor's property, absent stipulation, necessitate the  
4 expeditious prosecution of this case towards confirmation.

5           WHEREFORE Debtor renews its request for a plan review conference at the earliest  
6 available, convenient date.  
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9 DATED: July 21, 2021

THE FULLER LAW FIRM, PC

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11 By: /s/ Lars T. Fuller  
12 LARS T. FULLER  
13 Attorney for Debtor  
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